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May 26, 1988

William L. Warren, Esq.
Cohen, Shapiro, Polisher et al
997 Lenox Drive - Bldg. 3
Lawrenceville, New Jersey 08648

Re: Scientific Chemical Processing (SCP) Site - Carlstadt, N.J.

Dear Mr. Warren:

It is the purpose of this letter to summarize the major topics which were discussed during our meeting at EPA - Region II on May 17, 1988 and to confirm our understanding of the results of that meeting.

On-Site Remedial Investigation (RI)

EPA indicated at the meeting that that the Risk Assessment and Conclusions (Remedial Action Objectives) Sections of the On-site Remedial Investigation report should be submitted to EPA as soon as possible. According to the schedule which was given to us on March 19, 1988, this report was to have been completed and submitted to EPA on or before May 9, 1988. You had indicated at the meeting that this document would be submitted to EPA within two weeks of the meeting, i.e., by May 31, 1988.

On-site Feasibility Study (FS)

It is our understanding that Dames & Moore is now performing the FS in accord with the schedule which was given to EPA March 19, 1988 and that they have already completed the Development and Screening of Alternatives phases of this Study. Dames & Moore indicated at the meeting, however, that they would not be submitting the results of this work until after it has been reviewed by the SCP committee member(s). As we indicated at the meeting, these two (2) phases of the FS should be submitted to EPA by June 6, 1988.

Dames & Moore expressed their concern about that lack of defined ARARs for the site and their view that ARARs were a prerequisite for completing the FS. EPA/NJDEP are presently preparing a list

003689

of the site specific ARARs for this site.* However, as EPA expressed at the meeting, the FS can still proceed utilizing general, promulgated chemical-specific ARARs.

EPA indicated that the FS schedule which was proposed by Dames & Moore on March 19, 1988 was unacceptable to the Agency for all of the tasks after Task 10 (Initial Screening of Alternatives). EPA, therefore, requested that your group submit a new proposal to EPA which would address the remainder of the work required for the on-site FS. Dames & Moore stated that they would submit a new proposed schedule to EPA on or before May 27, 1988.

Off-Site Remedial Investigation

It is our understanding that Dames & Moore will submit a proposed schedule for the installation, collection and analysis of samples for the nine (9) off-site monitoring wells which are to be installed near the SCP Carlstadt site. These activities constitute the first phase of the Off-Site Remedial Investigation which will be required for this site.

We discussed proposed locations for the off-site monitoring wells (received by EPA on May 13, 1988.) It was agreed that one (1) additional monitoring well will be installed in the till aquifer, downgradient from the site. This well is to be located on the northern corner of Gotham Parkway and Peach Island Creek, as was discussed at and agreed to at the meeting.

EPA expressed its concern at the meeting about water quality conditions in the Bedrock aquifer which underlies the site. EPA also requested that Dames & Moore begin investigating the Bedrock aquifer. It was agreed upon that Dames & Moore would initiate the research and planning phases of a Bedrock Aquifer Study and that this study would constitute a part of the Offsite Remedial Investigation required for this site.

In order not to delay installation any of the nine (9) off-site wells, it was agreed that the Bedrock aquifer investigation, which constitutes the next phase of the offsite work, would be performed concurrently with the installation of these wells.

* Attached you will find a compendium of potential New Jersey State ARARs. Additional guidance will be forthcoming over the next few weeks.

If our understanding with regard to any of the above is erroneous or if you would like to discuss any of these items in any greater detail, please contact me at (212) 264-3297 at your earliest convenience.

Sincerely,

James P. Rooney
Attorney
Office of Regional Counsel

Enclosure

cc: Medhat Reiser, Nepera, Inc.
Jack McBurney, Allied-Signal, Inc.
Thomas Armstrong, General Electric Co.

003691